National Emission Standards for Hazardous Air Pollutants - Defense Land Systems and Miscellaneous Equipment

Paul Josephson/Colleen Rathbun

U.S. Army Environmental Center

Paul.Josephson@aec.apgea.army.mil

(410) 436-1205

Colleen.Rathbun@aec.apgea.army.mil

(410) 436-1554/DSN 584-1554

Outline

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Colleen Rathbun/SFIM-AEC-OC/(410) 436-1554 (DSN 584) /colleen.rathbun@us.army.mil

DLSME NESHAP

Background

- EPA previously promulgated NESHAPs for surface coating of aerospace and shipbuilding equipment, both of which applied to the military.
- In the late 1990's, EPA proposed NESHAPs for the surface coating of miscellaneous metal and plastic parts and products and metal furniture.
- Compliance with these new NESHAPs, along with the existing aerospace and shipbuilding rules, would have been extremely burdensome or even impossible on military installations.

Background (con't.)

- Potential impacts from multiple NESHAPs:
  - Each NESHAP has its own set of units, as well as compliance, record-keeping and reporting requirements
  - Surface coating operations at military installations include a variety of items (jets, rockets, ships, tanks, weapons systems, etc.) at the same location – a single paint booth could be subject to many NESHAPs
  - Many items coated by the military are made of more than one material – a single object could be subject to many NESHAPs
  - The military uses some special coatings that are different from many civilian coating operations (e.g., chemical agent resistant coating – CARC)

Background (con't.)

- The Clean Air Act Services Steering Committee (CAASSC) provided information to EPA to justify exempting DOD from the proposed NESHAPs.
- EPA exempted surface coating operations from the metal parts, plastic parts, metal furniture and fabric surface coating NESHAPs.
  - Example – MMPP exempts the surface coating of metal parts and products performed on-site at installations owned or operated by the Armed Forces of the U.S. or NASA, or the surface coating of military munitions manufactured by or for the Armed Forces of the U.S.
- EPA will promulgate a special NESHAP for surface coating on military installations (although aerospace and shipbuilding NESHAPs will still apply).
- DOD is working very closely with EPA and taking an active role in recommending draft rule language.

Current Status

- Data on DOD surface coatings has been provided in draft form to EPA
- Data is being refined, and, when final, will be used to establish the MACT
- DOD is working through issues regarding rule applicability, definitions, exemptions, compliance options, harmonization with existing rules and proposed language
- DOD meetings with EPA approximately every 6 months
- Proposed rule anticipated in FY 06

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Potential Applicability

- Military Surface Coating (Painting)
  - –Ground Based Equipment and Materiel (Tanks, HMMWVs, Trucks, Guns, Field Hospitals, Generators, Etc.)
  - –Topcoats, Primers, Cleaners, Solvents, Thinners, etc
  - –Affected source maintenance
- NASA equipment
- Probably Only Affect Major HAP Sources
- Chemical Depainting provisions
- Munitions – covered with no limits

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Out of Outline Experience #1

(a) Defense land systems and miscellaneous equipment means the following:

(i)Any materiel, equipment and/or components used by the Armed Forces of the United States in, as part of or in support of combat, training for combat or lot testing of materiel, equipment and components. Such materiel, equipment and components include, but are not limited to, combat vehicles, tactical vehicles, military personnel items, weapons, armament and engineering, communications, base camp, ground support and launch support equipment.

Out of Outline Experience #2

Affected source maintenance operations means the routine maintenance, repair or renovation (including the surface coating) of the tools, equipment, machinery, and structures that comprise the infrastructure of the affected source, are necessary for the affected source to function in its intended capacity, or are integral to the coating operation. Affected source maintenance operations include surface coating of paint booth structures, conveyors, tanks, racks and cranes that directly support and are integral to the coating operation at the affected source.

Colleen Rathbun/SFIM-AEC-OC/(410) 436-1554 (DSN 584) /colleen.rathbun@us.army.mil

Out of Outline Experience #3

Unrelated facility maintenance operations means the routine maintenance, repair or renovation (including surface coating) of equipment and structures on an installation owned or operated by the Armed Forces of the United States or the National Aeronautics and Space Administration that are not part of and do not directly support any affected source subject to this subpart. Unrelated facility maintenance operations include surface coating of building exteriors and other structures and the surface coating of equipment that is not integral to the coating operation at an affected source subject to this subpart.

Out of Outline Experience #4

This subpart does not apply to surface coating or a coating operation that meets any of the criteria of paragraphs(d)(1) through (7) of this section.

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(2) Surface coating that occurs as part of research, development, testing or evaluation operations, or are part of janitorial, building, and unrelated facility maintenance operations (as defined in this subpart), or that occur at hobby shops that are provided for personal use.

Potential Rule Provisions

- Limit Amount of HAPs in Coatings
- Limit Use of Chemical Depainting
- Compliance Units (Mass HAP / Volume Solid)
  - Lbs HAP/(Gallons Coating – Gallons Water)

    OR

  - Lbs HAP/(Gallons Coating – Gallons VOCs – Gallons Water)
- Only One NESHAP / Painting Operation
- Simple Data Collection
  - Require Data that We Already Collect
  - Technical Manuals may be Sufficient

Out of Outline Experience #5

Aerospace-related coating operation means all surface coating operations at a coating process group, the primary purpose of which is to perform surface coating of equipment subject to the Aerospace Manufacturing and Rework Facilities NESHAP ("Aerospace NESHAP") and other equipment, not otherwise covered by the Aerospace NESHAP, that directly affects the ability of an aerospace system to perform its mission or meet its requirements for structural integrity and/or performance. Aerospace-related coating operations include, but are not limited to, surface coating of aerospace support equipment and vehicles, aerospace shipping containers, aerospace piece parts and aerospace subcomponent assemblies.

Out of Outline Experience #6

An aerospace-related surface coating operation may conduct infrequent, occasional or incidental surface coating of equipment that is not aerospace-related and still be considered an aerospace-related surface coating operation.

Out of Outline Experience #7

(i) Aerospace-related coating operations may elect to comply with this subpart by applying the following provisions of the Aerospace Manufacturing and Rework Facilities NESHAP for all surface coating operations at that coating process group: _____

DLSME NESHAP

Schedule

- Summer 2005 – Draft MACT standard
- January 2006 – Proposed rule
- January 2007 – Final rule
- January 2010 – Compliance deadline

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